

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Orly Genger,

Debtor.

Chapter 7

Case No. 19-13895-JLG

DALIA GENGER,

Plaintiff,

Adv. P. No. 20-01010

-against-

ORLY GENGER, MICHAEL BOWEN, ARIE  
GENGER, ARNOLD BROSER, DAVID BROSER,  
ERIC HERSCHMANN, THE GENGER  
LITIGATION TRUST, ADBG LLC, TEDCO INC.,  
and DEBORAH PIAZZA as chapter 7 trustee,

Defendants.

**DECLARATION OF MICHAEL PAUL BOWEN**

MICHAEL PAUL BOWEN, an attorney duly admitted to practice law before this Court,  
hereby makes the following declaration pursuant to 28 U.S.C. § 1746:

1. I am a member of Kasowitz Benson Torres LLP (“KBT”), and submit this  
declaration in support of my and Eric Herschmann’s Joinder in Motion to Dismiss Amended  
Complaint brought by Dalia Genger.

2. Attached hereto as Exhibit A is a true and correct copy of a compilation of (i) the  
Settlement Agreement and Release, dated June 16, 2013, amongst the “AG Group” and the  
“Trump Group,” as those terms are defined in that agreement, (ii) the two Subordinated Notes  
each dated June 16, 2013, (iii) the First Amendment to Settlement Agreement and Release,  
executed by the AG Group and the Trump Group in 2017, and (iv) the two agreements each  
entitled First Amendment to Subordinated Note, each dated November 20, 2017.

3. Attached hereto as Exhibit B is a true and correct copy of the transcript of the deposition of Michael Bowen, dated October 5, 2018.

4. Attached hereto as Exhibit C is a true and correct copy of two UCC filings made on behalf of secured party Eric Herschmann, filed May 10, 2017 and May 15, 2017.

I, Michael Paul Bowen, declare under penalty of perjury that the foregoing is true and correct.

Dated: June 25, 2020

/s/ Michael Paul Bowen  
Michael Paul Bowen